

REMARKS

In the Final Office Action, the Examiner rejected claims 1-24 as unpatentable under 35 U.S.C. § 103(a). In particular, the Examiner rejected claims 1-2, 4, 7-9, 11, 14-15, 17-18, 20, 22, and 24 as unpatentable over Teraoka et al., "A Network Architecture Providing Host Migration Transparency" in view of Short et al., U.S. Patent No. 6,130,892. Claims 3 and 10 were rejected as unpatentable over Teraoka et al. and Short et al. further in view of Forman et al., "The Challenges of Mobile Computing." Claims 5 and 12 were rejected as unpatentable over Teraoka et al. and Short et al. further in view of Francis et al., U.S. Patent No. 5,331,637. Claims 6, 13, 16, 19, and 23 were rejected as unpatentable over Teraoka et al. and Short et al. further in view of V-One Corporation, "V-One's Smartgate VPN." Finally, claim 21 was rejected as unpatentable over Teraoka et al.

Applicants thank the Examiner for the courtesy of a telephone interview held on March 23, 2004. During that interview, the Examiner agreed that the primary reference cited to reject all of the claims, Teraoka et al., does not disclose or suggest a system including an update packet that is always sent from a destination node to a source node. Instead, in the system of Teraoka et al., a migrating host sends a "ConnectionNotification" packet to its native network. The packet contains the host's virtual address and its new physical address. Teraoka et al., p. 214, col. 1, ll. 2-5. As the "ConnectionNotification" packet travels to the native network, networks and gateways along its path learn the new physical address of the migrating host. Id., p. 214, col. 1, ll. 5-10.

As the Examiner agreed during the telephone interview, the "ConnectionNotification" packet of the reference is not always sent to a source node, i.e., a node that sent a first packet received by the destination node at its old address. For example, Figure 2 of the reference shows a migrating Host-X sending a "ConnectionNotification" packet to its native network Net-A, not to a source node, Host-Y. Indeed, the reference states that Host-Y does not know the new physical address of Host-X so that Host-Y must address a new message to the host's virtual address, meaning that the message is sent to the host's native network. Id., p. 214, col. 1, ll. 15-22; Fig. 2.

Furthermore, the "ConnectionNotification" packet of the reference does not suggest an update packet that is always sent to a source node. Instead, the purpose and function of the "ConnectionNotification" packet are to notify a migrating host's native network of its new physical address so that messages from other hosts can be redirected when they are sent to the migrating host's outdated address.

By this Amendment, Applicants have amended independent claims 1, 8, 15, 18, 21, and 22 to recite an update packet from a destination node such that the update packet is always sent to a source node. For example, claims 1 and 8 recite methods including the step of sending an update packet from a destination node such that the update packet is always sent to a source node. Claim 15 recites a method including the step of receiving, by a source node, an update packet sent by a destination node such that the update packet is always sent to the source node. Claim 18 recites a distributed system including a destination node that sends an update packet such that the update packet is always sent to the a source node. Claim 21 recites a data processing system

including means for sending an update packet from a destination node such that the update packet is always sent to a source node. Finally, claim 22 recites a computer readable medium including instructions for performing a method including receiving, by a source node, an update packet sent by a destination node such that the update packet is always sent to the source node. Therefore, Teraoka et al. fails to teach or suggest every element of independent claims 1, 8, 15, 18, 21, and 22, and the claims that depend therefrom.

Furthermore, none of the other cited references correct the deficiencies of Teraoka et al. Short et al. merely discloses a portable router for connecting to a network and is cited only for the teaching that routers can be implemented in software and/or hardware. Short et al., col. 2, ll. 29-30. Forman et al. is cited only for its teaching of a centralized database of addresses that is updated when a mobile computer changes its address. Forman et al., pp. 8-9. Francis et al. discloses a multicast routing method that is unrelated to an update packet that is always sent to the source node. Finally, "V-One's Smartgate VPN" generally describes a virtual private network that is also unrelated to an update packet that is always sent to the source node

Because the cited references, taken alone or together, fail to teach or suggest each element of amended claims 1-24, Applicants submit that the claimed invention is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the Examiner's continued examination and allowance of pending claims 1-24.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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